

**From:** [Stephen Koteff](#)  
**To:** ["Linda J. Johnson"](#)  
**Cc:** [Rikki Burns-Riley](#); [Sherry Sims](#); ["Jana Vanderbrink"](#)  
**Subject:** Bakalar v. Dunleavy, et al. and Blanford et al. v. Dunleavy et al.  
**Date:** Friday, February 22, 2019 5:22:00 PM  
**Attachments:** [image003.png](#)  
[Summons-Dunleavy & Babcock \(Bakalar\).pdf](#)  
[001-1. Summons & Complaint. 2019.02.06.pdf](#)  
[Summons-Dunleavy & Babcock \(Blanford\).pdf](#)  
[001-1. Summons & Complaint. 2019.02.06.pdf](#)

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Hello Linda,

Thanks again for a productive meeting today. As we discussed, I am sending with this email copies of the complaints and summonses in the referenced cases because you have agreed to accept service via email on behalf of the individual defendants. As we also discussed, however, my sending you these documents today does not imply that I agree that the individual defendants (Messrs. Dunleavy and Babcock) were not properly served by certified mail on January 22, 2019. Our position remains that service was perfected on January 23, 2019, and that the time limits in FRCP 81(c) are properly calculated based on that date.

Steve

**Stephen Koteff**

Pronouns: he, him, his

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Exhibit 2 to Declaration in Support of Application for Entry of Default  
Bakalar v. Dunleavy, et al.  
Case No. 3:19-cv-00025 JWS